

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
ROBERT ALLEN KELLER and : CASE NO: 1:22-bk-02193-HWV
TAMMY J. KELLER :
Debtors :
:

ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

To the Clerk of the Bankruptcy Court, the Debtor, All Trustees, All Creditors, and All Other Parties in Interest: **PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of PA CENTRAL FEDERAL CREDIT UNION (the “Credit Union”), and demands that all notices given or required to be given in this case, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telefax, telegraph, telex, ECF noticing or otherwise, which affects the Debtor are to be served upon:

Bret P. Shaffer, Esquire
Attorney I.D. #309180: PA
Schiffman, Sheridan & Brown, P.C.
2080 Linglestown Road, Suite 201
Harrisburg, PA 17110

PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as, nor is it, a consent to jurisdiction of the Bankruptcy Court over the Credit Union, specifically, but not limited to: (i) its right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which the Credit Union is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Credit Union hereby expressly reserves.

SCHIFFMAN, SHERIDAN & BROWN, P.C.

By:/s/Bret P. Shaffer

Bret P. Shaffer, Esquire
Attorney I.D. #309180: PA
2080 Linglestown Road, Suite 201
Harrisburg, PA 17110

Attorney for PA Central Federal Credit Union

Date: 12/23/2022

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served this date upon the following parties electronically through the ECF system automatically upon filing:

Jack N Zaharopoulos (Trustee)
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Asst. U.S. Trustee
United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

Paul Donald Murphy-Ahles
Dethlefs Pykosh & Murphy
2132 Market Street
Camp Hill, PA 17011

SCHIFFMAN, SHERIDAN & BROWN, P.C.

Date: December 23, 2022

By: /s/ Bret P. Shaffer
Bret P. Shaffer, Esquire PA#309180
2080 Linglestown Road, Suite 201
Harrisburg, PA 17110